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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	Case No.	2:21-MJ-654-BNW
)		
Plaintiff,)		
)		
vs.)	<u>STIPULATION AND ORDER</u>	
)	<u>TO MODIFY SENTENCE</u>	
CHRISTOHER R. WILLIAMS,)		
)		
Defendants.)		
)		

It is hereby stipulated and agreed, by and between Jason M. Frierson, United States Attorney; by and through Angelica Marmorstein, Assistant United States Attorney, counsel for the United States of America and Mace J. Yampolsky, Esq., counsel for Defendant Christopher R. Williams that:

1. That on March 30, 2022, the Defendant entered a guilty plea to Court One of the Complaint – Operating a Motor Vehicle while Under the Influence of Alcohol, a Violation of Title 36 C.F.R. § 4.23(a)(2), a Class B Misdemeanor.
2. That pursuant to the terms of the Plea Agreement, the parties jointly agreed to recommend that the Defendant be sentenced to unsupervised probation for a period of one year with special conditions, to include that:

- a. That the Defendant pay a \$500.00 fine and a mandatory \$10.00 penalty assessment. This was accomplished by the Defendant on March 30, 2022. (See Receipt attached hereto as Exhibit "A".
- b. That the Defendant attend and complete the Lower Court Counseling's (1) DUI course and (2) Victim Impact Panel. The Defendant completed the DUI course on August 24, 2022 (Exhibit "B"), and the Victim Impact Panel on August 24, 2022 (Exhibit "C").
- c. That the Defendant complete an eight (8) hour alcohol awareness course. This was accomplished by the Defendant on September 9, 2022. (See Certificate of Completion attached hereto as Exhibit "D").
- d. That the Defendant not return to Lake Mead National Recreation Area for a period of six (6) months.
- e. That the Defendant not violate any local, state, or federal laws.

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1 3. That pursuant to the terms of the Plea Agreement, if the Court sentenced the
2 Defendant as recommended (which it did), and if the Defendant successfully
3 completed conditions a, b, c and d as specified above, within the first six months of
4 his unsupervised probation (which he has), the parties shall move to allow the
5 Defendant to withdraw his guilty plea to Court One, and the Government shall move
6 to amend Count One to a charge of Reckless Driving, a violation of 36 CFR § 4.2 and
7 N.R.S. 484B.653, and the Defendant shall enter a plea of guilty.
8

9 DATED this 30th day of September, 2022.

10 Jason M. Frierson, United States Attorney

11 /s/ Angelica Marmorstein
12 ANGELICA MARMORSTEIN
Assistant United States Attorney

13 /s/ Mace J. Yampolsky
14 MACE J. YAMPOLSKY, ESQ.
Counsel for Defendant

15
16 **ORDER**

17 Based upon the foregoing, and good cause appearing; it is hereby ordered the
18 Government shall move this Court to amend Count One to a charge of Reckless Driving, a
violation of 36 CFR § 4.2 and N.R.S. 484B.653, and the Defendant shall enter a plea of guilty.

19 DATED: October 3, 2022

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21 US MAGISTRATE JUDGE
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